

EXHIBIT C

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF
3 WEST VIRGINIA AT CHARLESTON

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4 IN RE: ETHICON, INC., : Master File No.
5 PELVIC REPAIR SYSTEM : 2:12-MD-02327
6 PRODUCTS LIABILITY : MDL 2327
7 LITIGATION :

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9 THIS DOCUMENT RELATES TO CASE
10 CONSOLIDATION:

11 Terreski Mullins, et al., v. Ethicon,
12 Inc., et al.

13 Case No. 2:12-CV-02952

- - -

14 September 17, 2015

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15 Oral deposition of ANNE
16 HOLLAND WILSON, MBA, held in the offices
17 of Riker Danzig, 500 Fifth Avenue, New
18 York, New York 10110, commencing at
19 9:20 a.m., on the above date, before
20 Margaret Peoples, a Registered
21 Professional Reporter and Notary Public
22 in and for the States of Pennsylvania,
23 New York and Connecticut.

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24 GOLKOW TECHNOLOGIES, INC.
 877.370.3377 ph|917.591.5672 fax
 deps@golkow.com

1 myself.

2 Are QSIT inspections
3 different than the work that is the
4 subject of your expert report?

5 A. Really, QSIT inspections
6 have no bearing on my report.

7 I mean QSIT inspections
8 are -- you know, that's how FDA was
9 trained ten years ago on doing
10 inspections.

11 Some people still follow it,
12 but that really has no bearing on risk
13 management, quality management systems in
14 medical devices.

15 Q. Thank you, Ms. Wilson.

16 Let's talk about that for a
17 few more minutes, because you've raised
18 it.

19 You were asked a lot of
20 questions earlier about the FDA and
21 regulators.

22 Are the FDA regulations
23 necessary to the analysis and opinions
24 that you offered in your expert report?

1 A. No.

2 Q. Why not?

3 A. Because the same type of
4 regulations are in the other standards
5 that I did cite. This specifically was
6 not to talk about the FDA.

7 This is about there's
8 guidance documents out there. There's
9 documents that have been out there for 30
10 years that aren't specific to the FDA
11 that govern how medical device
12 manufacturers should do these things.

13 Q. So, in other words, if you
14 were told that your report -- the subject
15 of your report and your testimony at
16 trial, that you cannot mention the FDA,
17 is it fair to say that you could offer
18 your opinions at trial without even
19 mentioning the word "FDA"?

20 MR. COMBS: Objection to
21 form.

22 THE WITNESS: Absolutely.

23 BY MR. WALLACE:

24 Q. Were you ever -- you gave